

# **EXHIBIT 4**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

WI-LAN, INC.

Plaintiff,

v.

ALCATEL-LUCENT USA INC.;  
TELEFONAKTIEBOLAGET LM  
ERICSSON; ERICSSON INC.;  
SONY ERICSSON MOBILE  
COMMUNICATIONS AB;  
SONY ERICSSON MOBILE  
COMMUNICATIONS (USA) INC.;  
HTC CORPORATION;  
HTC AMERICA, INC.; EXEDEA INC.;  
LG ELECTRONICS, INC.;  
LG ELECTRONICS MOBILECOMM  
U.S.A., INC.; AND  
LG ELECTRONICS U.S.A., INC.

Defendants.

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Civil Action No. 6:10-cv-521

**DEFENDANTS HTC CORPORATION, HTC AMERICA, INC., AND EXEDEA INC.’S  
AMENDED TRIAL WITNESS LIST**

Defendants HTC Corporation, HTC America, Inc., and Exedea Inc. (collectively, “HTC”), files this Amended Trial Witness List. HTC reserves the right to call any witness appearing on any opening or rebuttal trial witness lists of Wi-LAN Inc. (“Wi-LAN”); Telefonaktiebolaget LM Ericsson; Ericsson Inc.; Sony Mobile Communications AB; Sony Mobile Communications (USA) Inc.; or Alcatel-Lucent USA Inc. HTC includes in this Amended Trial Witness List individuals who may be listed on Wi-LAN’s opening and rebuttal witness lists without waiving any right to object to Wi-LAN’s presentation of such witnesses at

trial, without waiving any objections to the admissibility of any such testimony, and without waiving the right to move for the exclusion of any testimony.

HTC hereby submits the following list of witnesses for trial:

<b>No.</b>	<b>Witness</b>	<b>Employer</b>	<b>Topic</b>	<b>Likelihood</b>
1	Robert Akl	University of North Texas	Non-infringement	Will Call
2	Chris Bakewell	Duff & Phelps	Damages	Will Call
3	Mark Lanning	Reticle Consulting, Inc.; Telecom Architects, Inc.	Invalidity	Will Call
4	Hsiu Lai Fen	HTC	Sales and marketing	May Call
5	Jason Mackenzie	HTC	Sales and marketing	May Call
6	Marcia Markovich	HTC	Marketing	May Call
7	Mike Woodward	HTC	Sales and marketing	May Call
8	Frank Wu	HTC	Technical	May Call
9	Lynn Yu	HTC	Licensing	May Call
10	Nate Chizgi	Qualcomm	Technical and Corporate	May Call
11	Ming-Chieh Kuo	Qualcomm	Technical and corporate	May Call
12	David Brandt	Airspan	Airspan corporate	May Call
13	Martin Lysejko	Airspan	Patents-in-suit, invention, prior art	May Call
14	Paul Struhsaker	Airspan	Patents-in-suit, invention, prior art	May Call

<b>No.</b>	<b>Witness</b>	<b>Employer</b>	<b>Topic</b>	<b>Likelihood</b>
15	Joemanne Chi Cheung Yeung	Airspan	Patents-in-suit, invention, prior art	May Call
16	Charles Fish	Baker Botts	Patent prosecution	May, But Probably Will Not Call
17	Natalya Bezryadina	Wi-LAN	Wi-LAN corporate and royalties	May Call
18	Christian Dubuc	Wi-LAN	Wi-LAN corporate	May Call
19	Shaun McEwan	Wi-LAN	Wi-LAN corporate	May Call
20	William Middleton	Consulting	Wi-LAN corporate and licensing	May Call
21	Andrew Parolin	Wi-LAN	Wi-LAN corporate	May Call
22	Yan Liu	Qualcomm	Technical and Corporate	May Call

HTC also reserves the right to amend or supplement this Trial Witness List and to call additional witnesses not included on this list, and to call substitute witnesses should the listed witness become unavailable.

Dated: February 13, 2013

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By

/s/ Eric H. Findlay

Eric H. Findlay

**Sheppard Mullin Richter & Hampton LLP**

12275 El Camino Real, Suite 200

San Diego, California 92130

Telephone: (858) 720-8900

Facsimile: (858) 509-3691

Email: [mbader@sheppardmullin.com](mailto:mbader@sheppardmullin.com)

Eric H. Findlay

State Bar No. 00789886

**Findlay Craft LLP**

6760 Old Jacksonville Highway, Suite 101

Tyler, Texas 75703

Telephone: (903) 534-1100

Facsimile: (903) 534-1137

Email: [efindlay@findlaycraft.com](mailto:efindlay@findlaycraft.com)

**Attorneys for Defendants**

**HTC CORPORATION, HTC AMERICA,  
INC., EXEDEA, INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 13, 2013, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(b)(1).

/s/ Eric H. Findlay  
Eric H. Findlay

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Plaintiff,	§	
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COMMUNICATIONS AB;	§	
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COMMUNICATIONS (USA) INS.;	§	
HTC CORPORATION;	§	
HTC AMERICA, INC.; EXEDEA INC.;	§	
LG ELECTRONICS, INC.;	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC.; AND	§	
LG ELECTRONICS U.S.A., INC.	§	
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Defendants.	§	
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/s/ Eric H. Findlay

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**Sheppard Mullin Richter & Hampton LLP**

12275 El Camino Real, Suite 200

San Diego, California 92130

Telephone: (858) 720-8900

Facsimile: (858) 509-3691

Email: [mbader@sheppardmullin.com](mailto:mbader@sheppardmullin.com)

Eric H. Findlay

State Bar No. 00789886

**Findlay Craft LLP**

6760 Old Jacksonville Highway, Suite 101

Tyler, Texas 75703

Telephone: (903) 534-1100

Facsimile: (903) 534-1137

Email: [efindlay@findlaycraft.com](mailto:efindlay@findlaycraft.com)

**Attorneys for Defendants**

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/s/ Eric H. Findlay  
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